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CUSTOMER NO.: 24498

Serial No.: 09/822,855

Docket No.: PU040192

Art Unit: 2173

Examiner: Michael Roswell

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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
Before the Board of Patent Appeals and Interferences**

**JUL 14 2006**

In re application of	Alex Holtz et al.	Customer Number 24498
Art Unit:	2173	Examiner: Michael Roswell
Application No.:	09/822,855	Filed: April 2, 2001
For:	Method, System and Computer Program Product for Full New Integration and Automation in a Real Time Video Production Environment	

**REPLY BRIEF**

Pursuant to 37 C.F.R. 41.41, applicants hereby submit this brief in reply to the answer mailed by the examiner on 22 May 2006. Applicants will address the arguments raised in the examiner's answer in the order in which they appear in the answer.

**35 U.S.C. 102(b) Rejection of Claims 1, 2 11 and 13**

In their Brief on Appeal, applicants maintain that claims 1, 2, 11 and 13 possess novelty over U.S. Patent 5,795,228 to Douglas Trumbull et al. In particular, claim 1 recites the feature of

converting said show rundown into broadcast instructions that, when executed in a step-by-step manner responsive to a manual trigger from the producer in an event-driven manner, enable the transmitting of commands to control the plurality of production devices to thereby produce the show live in real time for at least one of transmission and recording, wherein said transmitting includes transmitting commands to at least a camera, and a robotic pan/tilt head (emphasis added).

Claim 2 depends from claim 1 and incorporates this feature by reference. Apparatus claim 11 recites means for converting the show rundown and also includes the feature of transmitting commands to a camera and robotic pan/tilt head. Claim 13 is directed to a computer program product of the type sanctioned by *In re Beauregard* (53 F. 3d 1583 (Fed Cir. 1995) and likewise includes the feature of transmitting commands to a camera and robotic pan/tilt head.

To maintain the 35 U.S.C. 102(b) rejection of claims 1, 2, 11 and 13, the examiner refers to the disclosure at Col. 6, lines 43-46 and Col. 8, lines 1-9, and FIGS. 2-4 of Trumbull et al as support for applicants' feature of transmitting commands to a camera and a robotic pan/tilt head. However, a careful of such disclosure reveals no such support for the examiner's proposition.

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With regard to FIGS. 2-4 of Trumbull, FIG. 2 depicts a portion of a database used for controlling a display. It is worth noting that FIG. 2 does not depict any type of camera or robotic pan tilt head. FIG. 3 depicts a show director system (38) for controlling each of a Giant Display Assembly (40) an Audio Assembly (42) and a Lighting Assembly (44). FIG. 4 depicts the details of the Giant Display Assembly (40) which includes a video camera (58) that supplies a video playback and mixing station (48) with video. With regard to FIG. 4, it should be noted that the connection between the camera (58) and the video playback and mixing station (48) consists of a single **outbound path** from the camera.

Moreover, the two cited portions of Trumbull specification cited by the examiner also contain no disclosure whatsoever concerning transmitting commands to the camera as recited in applicants' claims. First consider the examiner's reliance on the disclosure in Trumbull et al. at Col. 6, lines 43-46 reproduced below:

The Show Director System 38 generates show control signals for controlling a Giant Display Assembly 40, an Audio Assembly 42 and a Lighting Assembly 44. *The Show Director System 38 thereby controls physical devices involved in a show, such as doors, lights, and image and sound playback apparatus (italics added)* and thus "performs" the show. By varying the actions of the Giant Display Assembly 40, Audio Assembly 42 and Lighting Assembly 44, the Show Director System 38 can perform a variety of different shows.

This cited portion of Trumbull et al. contains no mention of the camera, let alone the desirability of transmitting commands to the camera to facilitate its control. At best, this cited portion of Trumbull et al alludes to the ability of the video playback and mixing station (48) to select and mix signals from the camera (58), a TV signal receiver (46) and a video tape player (50).

The disclosure at Col. 8, lines 1-9 of Trumbull et al. concerns control of a pan and tilt mechanism associated with a light source. Again, there is no mention of the camera (58) let alone the desirability of transmitting signals thereto for controlling the camera.

In support of his rejection, the examiner suggests that the user interface (14) of Trumbull et al controls the show controller (20) which in turn controls the show director (38) that controls the Giant Display Assembly (40) which includes the camera (58). However, the examiner has not shown that the camera (58) is controlled by way of commands transmitted thereto to meet applicants' claimed feature of transmitting commands to the camera. Indeed, the examiner admits that the video playback and mixing station (48) does not control the camera. Yet, the Trumbull et al. patent does not show or describe any other link to the camera

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(58) and the examiner has not pointed to any other direct link to the camera (58) for transmission of signals to the camera to facilitate its control. Additionally, the examiner has not identified any disclosure in the Trumbull et al. specification which explicitly recites any such other mechanism coupled to the camera for transmitting signal thereto to facilitate camera control.

Simply stated, the examiner has identified any disclosure in Trumbull et al. for transmitting signals to the camera to facilitate its control as recited in claims 1, 2, 11 and 13. Indeed, the examiner has admitted that the only apparatus depicted in the Trumbull et al. patent that is connected to the camera **does not transmit signals to the camera**. Therefore, the examiner has failed to establish a *prima facie* case of anticipation, warranting reversal of the 35 U.S.C. 102(b) rejection of the claims.

**35 U.S.C. 103(a) Rejection of Claims 3-6, 8, 12 and 14**  
**35 U.S.C. 103(a) Rejection of 7 and 9**  
**35 U.S.C. 103(a) Rejection of Claim 10**

The examiner has rejected claims 3-6, 8, 12 and 14 under 35 U.S.C. 103(a) as obvious over Trumbull et al. in view of US patent 6,437,802 to Kenny. Claims 7 and 9 stand rejected under 35 U.S.C. 103(a) as obvious over Trumbull et al. in view of Kenny, further in view of US Patent 6,441,832 to Tao et al. Claim 10 stands rejected under 35 U.S.C. 103(a) as obvious Trumbull in view of Kenny, and Tao et al. further in view of US patent 5,450,140 to Washino.

The various rejections under 35 U.S.C. 103(a) are all predicated on the examiner's contention that the Trumbull et al. teaches applicants' feature of controlling the television camera by transmitting signals thereto. As discussed above with respect to the 35 U.S.C. 102(b) rejection, the Trumbull et al. patent does not disclose or suggest this feature of applicants' claims. Therefore, the various rejection of applicants' dependent claims under 35 U.S.C. 103(a) fail for the same reason as the 35 U.S.C. 102(b) rejection must fail.

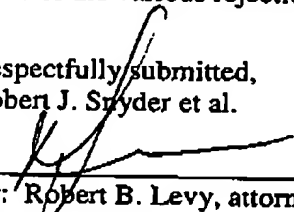
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**Conclusion**

In summary, none of the Trumbull et al. Kenny and Tao et al. or Washino patents, either alone or in any combination, teaches the features recited in applicants' claims 1-14. Therefore, applicants respectfully request reversal of the various rejections of the claims.

Respectfully submitted,  
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